

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SARAH PALIN, an individual,

Plaintiff,

– against –

THE NEW YORK TIMES COMPANY,
a New York corporation,

Defendant.

No. 17 Civ. 4853

Hon. Jed S. Rakoff

ECF Case

PLAINTIFF'S PROPOSED VOIR DIRE REQUESTS¹

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¹ These proposed instructions are filed with full reservation of all prior arguments and objections related to the issues of damages and actual malice and all arguments and objections asserted in pending court filings and the Joint Pretrial Order. Plaintiff respectfully requests leave to amend, modify or add to these instructions based on rulings the Court makes on pending motions.

PROPOSED QUESTIONS

- 1. Do you have any opinions about Gov. Sarah Palin?**
- 2. Do you have any opinions about the New York Times?**
- 3. Do you have any opinions about the media?**
- 4. Do you subscribe to any news websites or apps?**
- 5. Where do you typically get your news?**
- 6. Have you ever posted any comments about Sarah Palin on social media?**
- 7. Have you, any of your family members, or anyone close to you ever been the victim of gun violence?**
- 8. Do you have any opinions about the Second Amendment or Gun Control?**
- 9. Do you know anything about or did you follow the Jared Loughner shooting incident in 2011 in Arizona?**
- 10. Do you belong to any political organizations or special interest groups? If so, which ones?**
- 11. Have you ever donated money to any political organizations or special interest groups? If so, which ones?**
- 12. Do you have any opinions about civil lawsuits?**
- 13. Have you or has anyone close to you ever been a plaintiff or defendant in a civil lawsuit? If so, what kind of case?**
- 14. Do you have any opinions about damages awards in civil lawsuits?**
- 15. Have you followed any recent high profile court cases closely?**
- 16. Do you have any opinions about defamation (libel or slander)?**

/s/ Shane B. Vogt

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing Plaintiff's Proposed Voir Dire Questions was filed electronically on the 20th day of January, 2022. Notice of this filing will be sent by operation of the Court's electronic filing system to counsel of record for all parties as indicated on the electronic filing receipt. Parties and their counsel may access this filing through the Court's system.

I FURTHER CERTIFY that the foregoing Plaintiff's Proposed Voir Dire Questions were served electronically via e-mail on the 19th day of January, 2022, to:

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